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VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write pursuant to Rules 1.C and 3.A of Your Honor's Individual Practices to respectfully request leave of this Court to file a two-page letter reply to Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC ("TAG"), and Jennifer Abel's (collectively, the "Wayfarer Parties") partial opposition, ECF No. 393 (the "Opposition"), to Ms. Lively's and the Jones Parties' motion to amend the Case Management Plan and Scheduling Order (the "Case Plan"), ECF No. 386 (the "Motion").

The Wayfarer Parties' Opposition raises several new arguments and factual assertions, including the claim that there are no deficiencies in their document productions. Since filing the Motion, Ms. Lively has identified additional deficiencies, including new issues that came to light within the past day – making a brief reply necessary to ensure the record is accurate and complete. A reply will also allow Ms. Lively to directly address the Wayfarer Parties' mischaracterizations of her diligence in discovery.

Accordingly, Ms. Lively respectfully requests the Court grant leave for her to file a letter brief in reply to the Wayfarer Parties' Opposition, which is filed contemporaneously herewith.

Respectfully submitted,

/s/ Michael J. Gottlieb

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